Document: Date of RTC Check: Comments on the Programmatic Health and Safety Plan 3/5/2018

Not responsive and needs correction

Comment Number	Did Response Address Comment?	Confirmed Change in Programatic HASP and/or FSP-Specific HASP Addendum?
Overall HASP Comment		
1	Response is adequate pending review of the forthcoming FSP-specific HASP Addendums.	Yes the change has been made in the Programmatic HASP bu pending review of the FSP-specific HASP Addendums
rimary Comments		
1	Response is adequate pending review of updated Programatic HASP	Yes
2	Response is adequate pending review of updated Programatic HASP	In Table 8.3, the proposed PID action level of 5 - 25 ppm is no protective given the Permissible Exposure Limit of benzene ar vinyl chloride of 1 ppm that are listed in Table 8.1.
3	It is not specified in the response, but tasks requiring HAZWOPER certified personnel should include deployment and retrieval of sediment trap samples, both for divers and support personnel on the deck.	Yes
4	Response is adequate pending review of updated Programatic HASP	Yes
5	The definition of the exclusion zone should include areas where porewater samplers (peepers) and sediment trap samplers are retrieved and processed.	Yes the change has been made in the Programmatic HASP but pending review of the FSP-specific HASP Addendums
6	Procedures for AED use and function test should be demonstrated at the initial field safety meeting.	No information on conducting AED function and procedure te at the initial field safety meeting has been included in the ne Attachment F AED Program. No inspection/procedure test a the beginning of each field event has been specfied.
7	Response is adequate pending review of updated Programatic HASP	Yes
o be Considered Comments		
1	Response is adequate pending review of updated Programatic HASP	Pending review of the FSP-specific HASP Addendums
2	Response is adequate pending review of updated Programatic HASP	Yes
3	Response is adequate pending review of updated Programatic HASP	Yes
4	Response is adequate pending review of updated Programatic HASP	Yes
5	Response is adequate pending review of the forthcoming FSP-specific HASP Addendums.	Yes the change has been made in the Programmatic HASP by pending review of the FSP-specific HASP Addendums
6	Response is adequate pending review of updated Programatic HASP	Yes
7	Response is adequate pending review of updated Programatic HASP	Yes
8	Response is adequate pending review of updated Programatic HASP Response is adequate pending review of the forthcoming FSP-specific HASP Addendums. A dive safety plan must be included for the sediment trap - specific HASP Addendum. The EPA Region 10 Dive Team will require a minimum of two weeks for review of the dive safety plan. The dive safety plan must meet the requirements of USCG Commercial Diving Regulations, 46 CFR Part 197 and OSHA 29 CFR Part 1910, Subpart T - Commercial Diving and Scientific Diving Exemptions, dated 6/13/2011. The EPA Region 10 Dive Team will require a minimum of 2-weeks to review a dive safety plan.	Pending review of the FSP-specific HASP Addendums
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